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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
Plaintiff,

vs.

Abraham Chol Keech, and  
Peter Biar Ajak,

Defendants.

CR-24-00394-PHX-SPL

**GOVERNMENT'S RESPONSE TO  
DEFENDANTS' NOTICES OF PUBLIC  
AUTHORITY DEFENSE  
AND  
REQUEST FOR DISLCOSURE OF  
WITNESSES**

As required by Fed. R. Crim. P. 12.3(a)(3), the United States hereby responds to the notices of public authority defense filed by defendants Keech (Doc. 92) and Ajak (Doc.

93). The government denies that defendants exercised the public authority identified in their notices.

In addition, pursuant to Fed. R. Crim. P. 12.3(a)(4)(A), the government requests that defendants disclose the name, address, and telephone number of each witness the defendants intend to rely on to establish a public authority defense. Defendants must make such disclosure to counsel for the government within 14 days, as required by Fed. R. Crim. P. 12.3(a)(4)(B).

Respectfully submitted this 12th day of June, 2025.

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*s/M. Bridget Minder*

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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing a copy to the following CM/ECF registrants:

Richard C. Bock and Dominic Rizzi, *Attorneys for Abraham Keech*  
Kurt Altman, *Attorney for Peter Ajak*

*s/Alexandria Gaulin*  
U.S. Attorney's Office